Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	**WC Docket No. 18-60**
Iowa Network Access Division Tariff F.C.C. No. 1	**Transmittal No. 36**

REPLY IN SUPPORT OF PETITION FOR RECONSIDERATION OF AT&T SERVICES, INC.

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Pursuant to 47 C.F.R. § 1.106, AT&T Services, Inc. ("AT&T") hereby submits this Reply in support of its Petition for Reconsideration of the Commission's *Rate Order*,[1] concluding in part its investigation into Tariff F.C.C. No. 1 of Iowa Network Services, Inc. d/b/a Aureon Network Services ("Aureon").

INTRODUCTION

In its *Rate Order*, the Commission set a CLEC benchmark rate that relies on *Aureon's* mileage, even though the text of the CLEC benchmark rule requires a benchmark rate that "may not exceed the rate charged by *the competing ILEC*." 47 C.F.R. 61.26(f) (emphasis added). CenturyLink is the competing ILEC, and it would not have routed the traffic at issue more than 22 miles. AT&T Pet. at 10; Habiak Rate Decl., ¶¶ 25-26. In sanctioning a rate based on Aureon's mileage, the Commission has permitted Aureon to receive far more revenue—nearly twice as much—as CenturyLink, again in direct contravention of the stated purpose of the CLEC benchmark rule. AT&T Pet. at 11-12; Seventh Report and Order, *In the Matter of Access Charge Reform*, 16 FCC Rcd. 9923, ¶ 54 (2001) ("*Seventh Report and Order*").

[1] Memorandum Opinion and Order, *In the Matter of Iowa Network Access Division Tariff F.C.C. No. 1*, 2018 WL 3641034 (rel. July 31, 2018) ("*Rate Order*").

As explained below in Part I, Aureon's opposition offers no valid reason to support the Commission's CLEC benchmark rate, and the Commission should grant AT&T's petition.[2] Rather than offer a credible defense of the Commission's approach, Aureon instead devotes much of its opposition to re-arguing its claim that it should not be considered a "competitive LEC" for purposes of the 2011 transitional service pricing rules. Aureon Opp. at 1-6, 17-20. The Commission has twice rejected this position, *e.g.*, *Liability Order*, ¶¶ 25-26; *Rate Order*, ¶¶ 7 & n.72, and Aureon's request in its opposition that the Commission "[r]econsider[] the Commission's classification of Aureon as a CLEC" (Aureon Opp. at 6) is untimely. In any event, Aureon's position is inconsistent with the text of the 2011 rules.

ARGUMENT

I. THE COMMISSION ADOPTED A HYBRID BENCHMARK RATE USING AN APPROACH THAT VIOLATES THE TEXT, PURPOSE AND OBJECTIVE OF THE COMMISSION'S RULES

The Commission's benchmark rate calculation violates the CLEC benchmark rules because it based the rate on Aureon's weighted average mileage, rather than CenturyLink's. *See* Pet. at 7-10. The Commission's rules provide, in relevant part:

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[2] Six so-called "Competitive Local Exchange Carriers" have submitted comments opposing AT&T's petition. Not surprisingly, each of these entities is heavily involved in access stimulation, and their motivation for submitting their opposition is self-evident. To the extent that the Commission were to properly calculate the CLEC benchmark and thereby set the rate for CEA service at a competitive market price, it would curtail these six commenters' ability to engage profitably in access stimulation, which the Commission has previously characterized as a "wasteful arbitrage practice[]." *In re Connect Am. Fund*, 26 FCC Rcd. 17663, ¶ 33 (2011). Because CLECs engaged in access stimulation can no longer impose access charges for end-office switching, one of the ways that they continue to prosper is by charging inflated rates for direct connections, pursuant to which IXCs can bypass Aureon's CEA service. That capability is directly impacted by the level of Aureon's CEA rates. To the extent that Aureon's CEA rate is inflated, the rate charged by CLECs for a direct connect will also be inflated. This arbitrage practice, however, would be reduced if Aureon's CEA rate were benchmarked to a competitive market rate. Of course, such a result would not be good for these six commenters, which is why they oppose the relief sought by AT&T and favor high transport rates.

> If a CLEC provides some portion of the switched exchange access services used to send traffic to or from an end user not served by that CLEC, the rate for the access services provided may not exceed the rate charged by the competing ILEC for the same access services.

47 C.F.R. § 61.26(f). Simply put, these rules require the Commission to identify: (1) the "competing ILEC," (2) the access services that the competing ILEC would provide to replace the portion of the "switched exchange access services" that the CLEC provides to transport the traffic at issue, and (3) the resulting "rate charged by the competing ILEC" for "the same" transport service identified in step 2. *See* Pet. at 4-5. The Commission erred in the third step of this analysis when it used a hybrid rate based on CenturyLink's rate elements and Aureon's network mileage.

The Commission's rules instead require that the "rate charged by [CenturyLink]" be based on the airline distance between CenturyLink's own tandem and the subtending LEC's end office switches, which is at most 22 miles, for a resulting rate of $0.003188 per minute ("/min."). *See* 47 C.F.R. §§ 69.111(a)(2)(i), (d)(2); Habiak Rate Decl., ¶¶ 25-25. Aureon and its subtending CLECs proffer several arguments against this reading of the Commission's rules. However, none of them withstand scrutiny.

A. The "Rate Charged" By Competing ILECs Is For The Competing ILEC's Own Service; It Is Not Equivalent To The Tariffed Rate Elements.

Aureon argues that the $0.003188/min. rate is based on a hypothetical—that it is the rate CenturyLink "would" charge in the "non-existent theoretical future." Aureon Opp. at 10; *see also* CLEC Opp. at 9 (CLECs should not be "precluded from … billing for mileage traversed on the 'actual network used,' rather than the hypothetical network AT&T would like to use instead."). However, the entire "CLEC Benchmark" analysis is, in fact, "theoretical." In determining the CLEC Benchmark, the Commission must first assume that the "services *were not* provided by the CLEC." 47 C.F.R. § 61.26(a)(2) (emphasis added). The Commission must then identify the "competing ILEC" and next calculate the rate that would be charged by that "competing ILEC."

47 C.F.R. § 61.26(f). This is why the Commission held that "the question to be answered is whether CenturyLink would provide [the service] *if Aureon did not provide it*." *Rate Order*, ¶ 25 (emphasis added); *see also Seventh Report and Order*, ¶ 59 (rates are to be modeled on a "competitive market, in which *new entrants* can successfully enter only at or below the prevailing market price" (emphasis added)).

Moreover, even if the analysis were not "theoretical," Aureon's contention would fail because CenturyLink does in fact provide tandem switching and transport service and thus has the capability to provide the service that Aureon provides. As the Commission recognized in the *Rate Order*, "Aureon's subtending LECs previously connected to IXCs through CenturyLink's predecessor in the same general locations, [so] it seems reasonable to assume that such connections could be reestablished if necessary." *Rate Order*, ¶ 23. Additionally, Aureon presented no "evidence that any other carrier in Iowa is capable of providing connections to IXCs at these locations" (*see id.*), nor did it take issue with AT&T's calculation of the rate that would be charged by CenturyLink. Further, Aureon has not challenged these determinations on reconsideration. Consequently, the issue of whether CenturyLink could or could not provide the service has already been resolved, and CenturyLink's $0.003188/min. rate is the correct benchmark rate.

Aureon goes on to suggest that even if CenturyLink is the competing ILEC, the benchmark "rate" is a reference to the standalone rate elements in CenturyLink's tariff, and is divorced from any mileage component relating to CenturyLink's provision of service. *See* Aureon Opp. at 10-11 ("The FCC used CenturyLink's *tandem-switched transport per mile rate* of $0.000030, and applied CenturyLink's *rate* to the average weighted miles…."). However, the CLEC benchmarking rules require the Commission to identify the "rate *charged by* the competing ILEC," which is not the standalone rate elements (such as the per-mile transport rate of $0.000030), but

rather the overall rate that CenturyLink *charges* IXCs to transport traffic on its network, which based on 22 miles of transport is $0.003188/min. Stated differently, the CLEC benchmark rate is the rate *charged by* CenturyLink to transport the traffic—not each of the standalone rate elements.

B. As Recognized In the *Rate Order*, the Competing ILEC Rate Is the Rate for Tandem Switching and Transport Services, Not CEA Service

Aureon suggests that the term "access services" in Section 61.26(f) refers only to CEA service and its equal access functionality. Aureon Opp. at 14 ("Section 61.26(f) requires the FCC to apply CenturyLink's rates to 'the same access services,' i.e., CEA service."); *see also id*. at 12. However, the Commission soundly rejected Aureon's view in the *Rate Order*, from which Aureon did not seek reconsideration. *Rate Order*, ¶ 28 ("We also reject Aureon's contention that CenturyLink's network does not offer the same functionality as Aureon and thus, CenturyLink's access services cannot serve as the benchmark.").

Further, Aureon's view is at odds with the plain text of the rule, which refers three times to the term "access services"—a defined term that does *not* include equal access functionality:

> If a CLEC provides some portion of the [i] switched exchange access services used to send traffic to or from an end user not served by that CLEC, the rate for the [ii] access services provided may not exceed the rate charged by the competing ILEC for [iii] the same access services.

47 C.F.R. § 61.26(f). The reference to [ii] the CLEC's "access services provided" and [iii] the competing ILEC's "same access services" are both references back to [i] the "switched exchange access services" used to send traffic to or from an end user not served by the CLEC. *Id*. And "switched exchange access services" is a defined term that includes a baseline or "functional equivalent" set of rate elements that both the CLEC and competing ILEC would "use[] to send traffic to or from an end user." 47 C.F.R. § 61.26(a)(3), (f). For this reason, the Commission concluded in the *Rate Order* that the "fundamental tariffed access services at issue here are tandem switching and transport services"—*not* CEA service. *Rate Order*, ¶ 28. Aureon pushes back

against this reading on the ground that "the rule makes no reference at all to the services that the ILEC 'would provide.'" Aureon Opp. at 13. Not true, as the rule defines "switched exchange access services" to include the "functional equivalent" of the "*ILEC interstate exchange access services*." 47 C.F.R. § 61.26(a)(3) (emphasis added). In sum, Aureon's view is based on a fundamental misreading of the rule.[3]

C. The Competing ILEC Rate Charged Must Be Based On the Competing ILEC's Own Network

As explained in AT&T's Petition, the Commission's rules require that the benchmark rate must be based on the competing ILEC's network, meaning the weighted average distance between the competing ILEC's tandem switching offices and the sub-tending LEC end offices. Pet. at 7-8; 47 C.F.R. § 69.111(d)(2) (the "per-minute charge … may be distance-sensitive. Distance shall be measured as airline distance between the [ILEC's] tandem switching office and the end office."). Aureon contends that this rule "does not apply to CLECs" and "it is only relevant to the computation of transport charges provided by the ILEC, and that are contained in the ILEC's own tariff." Aureon Opp. at 14-15. But that is entirely the point—the benchmark rate analysis does not compare the CLEC's rate against the rate of the *CLEC*; rather it requires the Commission to compare the CLEC's rate to the rate of the *ILEC*. And to compute *that* rate (the "rate *charged by*

[3] Aureon goes a step further and argues that the above-described benchmark analysis cannot even be run because the CLEC benchmark rules do not include a comparable, non-distance-sensitive service. *See* Aureon Opp. at 12 ("CenturyLink has never 'charged' a non-distance-sensitive transport rate nor provided a non-distance-sensitive CEA service. Furthermore, section 61.26(a)(3) only includes a "per mile" or distance-sensitive tandem switched transport facility service in the list of services that are functionally equivalent to a competing ILEC's service."). The Commission has already rejected this species of argument. *See Rate Order*, ¶ 28 ("competitive LECs' networks and the specific technologies they use may be different than those provided by incumbent LECs, but such differences do not necessarily preclude the ability to benchmark access services."). And as noted above, the Commission's rules do *not* require the CLEC and competing ILEC to provide *identical* services. Rather, the Commission need only identify a "functional[ly] equivalent" set of rate elements. 47 C.F.R. § 61.26(a)(3).

the competing ILEC," 47 C.F.R. § 61.26(f)), the Commission must follow all rules applicable to the computation of the competing ILEC's rate, including Section 69.111.[4]

D. Use of Aureon's Mileage to Calculate the Benchmark Rate Would Render Superfluous the Commission's Revenue Comparison Requirement

AT&T's Petition also demonstrated that, contrary to the Commission's rules, Aureon's revenues far exceed those that CenturyLink would receive to transport the very same traffic. Pet. at 11-12; *Seventh Report and Order*, ¶ 54 ("by moving CLEC access tariffs to the competing ILEC rate, we intend to permit CLECs to receive revenues equivalent to those the ILECs receive from IXCs."). Aureon does not dispute the applicability of this rule, nor does it challenge the accuracy of AT&T's revenue calculations. *See* Aureon Opp. at 16-17. Instead, Aureon argues that its own mileage should apply to both calculations, and if its mileage is used, it would "receiv[e] the same dollar amount that CenturyLink would have received." *Id*. at 16. However, if the same mileage is used for *both* the CLEC *and* ILEC revenue calculations, the resulting amounts would *always* be the same. This is why the competing ILEC's revenue (and rate) must be calculated based on the mileage of the competing ILEC's network. Anything less would render superfluous the

[4] The CLECs contend that "AT&T wants to pay Aureon *as if* AT&T delivered its own calls to all corners of Iowa while also receiving the great benefit of not actually having to do the work" and that "AT&T likely would have to make a significant financial investment to deploy new facilities throughout Iowa." CLEC Opp. at 11-12. However, in a competitive market (which is what the CLEC benchmark is designed to mimic), that is *exactly* what would happen, given Aureon's excessive rates. It is also consistent with the Commission's objective in authorizing Aureon CEA service, which was to lower costs. *See AT&T Corp. v. Alpine Commc'ns, LLC*, 27 FCC Rcd. 11511, ¶ 29 (2012) ("the Commission approved the creation of INS in order to lower the cost of transporting traffic."). The fact that Aureon's costs are higher than the competitive market price is not AT&T's fault, nor does it justify Aureon charging excessive rates. It also is not true, as Mr. Rhinehart has demonstrated, if Aureon properly allocated its CWF costs, its cost of service rate for its centralized service would be lower than the CenturyLink-based CLEC benchmark rate, which is wholly consistent with what the FCC in 1988 contemplated. *See* Rhinehart Supp. Rate Decl., ¶ 8. Further, the fact that the revised rate for CEA service that Aureon just filed ($0.00296/min.) is lower than the CLEC benchmark rate calculated using CenturyLink's mileage completely undercuts this point. *See* Transmittal No. 38 (dated Sept. 24, 2018).

Commission's revenue equivalency requirement.[5] Consequently, the Commission must instead use CenturyLink's mileage in calculating the CLEC benchmark rate.

E. Aureon Does Not Dispute That The Commission's Benchmark Analysis Is Internally Inconsistent.

As demonstrated in AT&T's Petition, the Commission's use of Aureon's network mileage is internally inconsistent; the Commission determined in the first two steps of the benchmarking analysis that Aureon's own network structure and functionality have no bearing on the analysis, but the Commission then took the opposite approach in the third step in computing the benchmark rate. Pet. at 16-18. Aureon offers no explanation, or justification, for this inconsistency.

AT&T further explained that the Commission's use of Aureon's mileage appears to be based on a concern that Aureon might not be able to recover its network costs. But as AT&T demonstrated, this concern is misdirected, given that the rules were designed to "dramatically reduce" tariffed access rates. Pet. at 20-21; *Seventh Report and Order*, ¶ 59 ("We recognize that the benchmark we adopt may dramatically reduce the tariffed access rates and revenues of many CLECs, particularly as the benchmark levels transition down over time. We conclude, however, that this reduction is warranted."). Aureon does not dispute that the rules were designed with this goal in mind; instead, Aureon appears to challenge the *rules themselves*, suggesting that a

[5] Aureon also suggests throughout its Opposition that AT&T's blended rate discussion is irrelevant because the blended rate rules do not apply to Aureon. *See* Aureon Opp. at 11-12 ("the FCC's decision regarding blended rate charges is … inapplicable to this proceeding"); *id*. at 16 ("Blended rates are also not relevant to the FCC's benchmark rate calculation for CEA service."). But AT&T has never argued that Aureon is subject to the blended rate rules; rather, AT&T's Petition demonstrates that the blended rate rules support AT&T's reading of the statute. *See* Pet. at 19-20. In situations where a CLEC uses a blended rate, that rate must be based on the individual rates of the IXCs; and if the CLEC uses its own mileage to compute the revenue those IXCs receive for the same traffic, the revenue calculations will be wildly inaccurate. *Id* & n.39. Aureon does not challenge this conclusion.

reduction in its rates would violate the Takings Clause of the Fifth Amendment. Opp. at 18 n.52. As discussed below, such arguments are not properly at issue in connection with AT&T's Petition.

II. AUREON'S ARGUMENTS REGARDING THE APPLICATION OF THE CLEC BENCHMARK RATE ARE UNTIMELY AND HAVE BEEN REJECTED.

A large portion of Aureon's opposition is a belated request by Aureon for reconsideration of the Commission's determination that, for purposes of the transitional pricing rules, Aureon is a CLEC. *See*, *e.g.*, Aureon Opp. at 1-6 ("*Reconsidering* the Commission's classification of Aureon as a CLEC" is appropriate (emphasis added)). However, the Commission initially made this determination in the *Liability Order*, *see* ¶¶ 25-26, and then re-affirmed it in the *Rate Order*, ¶¶ 7 & n.72. The time for Aureon to have sought reconsideration on this issue has thus long passed, *see* 47 U.S.C. § 405; 47 C.F.R. § 1.106(f) (petitions for reconsideration due within 30 days of public notice), and Aureon cites no precedent that allows its request for reconsideration to be filed late, in an opposition to AT&T's Petition—which did not raise this issue at all. The Commission should thus strike or ignore these aspects of Aureon's opposition.[6]

In any event, Aureon's claim lacks merit, as the Commission has already explained. Aureon repeats its argument that it is inconsistent to treat Aureon, which is and has been a dominant carrier, as subject to the benchmark rules applicable to CLECs, which are non-dominant. Aureon Opp. at 1-6. There is no inconsistency, and the two sets of rules "complement each other," as the Commission found. *See Liability Order*, ¶ 25. There is nothing unusual about requiring Aureon, a dominant carrier, also to follow the rate cap and rate parity rules, which apply to all

[6] In fact, Aureon's request for reconsideration in its opposition may have created a jurisdictional quagmire, because Aureon has filed petitions for review of both the *Liability Order* and *Rate Order*. A party cannot simultaneously file a petition for review and seek reconsideration of the same issue, but that is what Aureon seems to have done. Because the Commission arguably lacks jurisdiction to consider the merits of Aureon's request in light of Aureon's petition for review, the best course is for the Commission to strike or reject its claims as untimely.

LECs. Nor is it erroneous to treat Aureon as a CLEC under the 2011 rules—indeed, the text of the Commission's rules compels that conclusion.[7]

Aureon also misses the point in arguing that the CLEC benchmark regulations were intended in part as a substitute for rate-of-return regulation, and that, because Aureon remains subject to Section 61.38, it is not necessary for it also to be subject to the benchmark rules. Not long after issuing its 2011 rules, the Commission emphasized that it had authorized Aureon's operation in order "to *lower* the cost of transporting traffic" in Iowa, *Alpine*, ¶ 29 (emphasis added). Consequently, it is more than sensible to apply both sets of regulations to Aureon. Aureon remains dominant, and the cost-of-service rules still must apply under longstanding precedent; but in light of Aureon's central purpose, Aureon must also operate at least as efficiently as the competing ILEC, *i.e.*, CenturyLink, and it should not be permitted to use its tariff to impose a rate above the prevailing market price, thereby foisting inefficient routing costs on IXCs and their customers. The CLEC benchmark rules thus provide an important check on Aureon's tariffed rates.

CONCLUSION

For the reasons set forth above, the Commission should grant AT&T's Petition for Reconsideration.

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[7] *See Liability Order*, ¶ 25; 47 C.F.R. § 51.903(a) (CLEC is "any" LEC that is not an ILEC). For that matter, Aureon also fits squarely within the definition of "CLEC" in the benchmark rules. *See* 47 C.F.R. § 61.26(a)(1) (a CLEC is (i) a LEC that provides access service and (ii) is not an ILEC). Aureon claims that it "has always been regulated" as an ILEC. Opp. at 1. However, in the complaint case, Aureon repeatedly denied that it was an ILEC, and it is not disputed that Aureon did not provide local telephone service on February 8, 1996, and thus does not meet the definition of ILEC in the Commission's rules. 47 C.F.R. § 51.5; *see also, e.g.* Joint Statement, ¶ 51 ("Aureon is not an ILEC or a CLEC."); Answer, ¶ 3 (same). Nor do AT&T's district court pleadings change this result (*see* Opp. at 5 & n.23). AT&T argued that, if the Commission did not treat Aureon as a CLEC, then at a minimum, Aureon could be estopped from denying that it is subject to the 2011 rules as a "rate-of-return" carrier, because Aureon had represented that it was regulated on this basis. *See id.* Because the Commission agreed that Aureon is a CLEC for purposes of its 2011 rules, there was no need to address AT&T's alternative estoppel argument.

Respectfully submitted,

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Dated: September 26, 2018

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2018, I caused a copy of the foregoing Reply in Support of Petition for Reconsideration of AT&T Services, Inc., as well as all accompanying materials, to be served via email on the following:

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